

REMARKS

Claims 14 to 26 are pending in the present application.

Applicant respectfully requests reconsideration of the application in view of the above amendments and the following explanations.

Applicant thanks the Examiner for considering the previously filed Information Disclosure Statement (IDS), 1449 paper, and cited references.

In response to the drawing objections, Figure 1 has been amended to provide descriptive text labels for the various elements. Reference numerals 14 and 16 have been deleted. Reference numeral 28 has been redrawn to refer to a star network, which is encompassed within the entire device 10. That is, the star network 28 refers to the internal elements of the device 10, including all connections therewithin. A marked-up copy of each replacement sheet including annotations indicating the changes made to the previous version has been included. Approval and entry are respectfully requested. Withdrawal of the drawing objections is therefore respectfully requested.

Claims 14 to 26 were rejected under 35 U.S.C. § 112, first paragraph. In view of the amendments to the drawings and specification, Applicant respectfully requests that this rejection be withdrawn.

Claims 14 to 26 were rejected under 35 U.S.C. § 103(a) as obvious over German Patent No. DE 10153484 ("Gilge") in view of Local Area Networks Architectures and Implementations ("Martin").

As to obviousness, in rejecting a claim under 35 U.S.C. § 103(a), the Office bears the initial burden of presenting a *prima facie* case of obviousness. In re Rijckaert, 9 F.3d 1531, 1532, 28 U.S.P.Q.2d 1955, 1956 (Fed. Cir. 1993). To establish prima facie obviousness, three criteria must be satisfied. First, there must be some suggestion or motivation to modify or combine reference teachings. In re Fine, 837 F.2d 1071, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988). This teaching or suggestion to make the claimed combination must be found in the prior art and not based on the application disclosure. In re Vaeck, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991). Second, there must be a reasonable expectation of success. In re Merck & Co., Inc., 800 F.2d 1091, 231 U.S.P.Q. 375 (Fed. Cir. 1986). Third, the prior art reference(s) must teach or suggest all of the claim features. In re Royka, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974).

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Amendments to the Drawings:

The attached Replacement Sheet of drawings includes changes to Figure 1. This Replacement Sheet replaces the original sheet including Figure 1. In Figure 1, descriptive text labels for the various elements have been provided. Reference numerals 14 and 16 have been deleted. Reference numeral 28 has been redrawn to refer to a network of components encompassed within the entire device 10. No new matter has been added, and the Replacement Sheets are supported by the present application, including the specification. Approval and entry are respectfully requested.

Attachments: one (1) Replacement Sheet

Claim 14 provides for a data gathering/data processing device for video/audio signals, comprising *a plurality of signal processors, at least a subset of the signal processors being coupled to a network having a star-shaped topology.*

The Office Action admits that the Gilge reference does not disclose or suggest a star-shaped topology, but relies upon the Martin reference as assertedly curing this deficiency. The Office Action purports to find motivation to combine these references based on the following asserted reasons. First, the Office Action asserts that because Martin teaches that LANs have been used to implement alarm systems, it asserts motivation to use a LAN with the system of the Gilge reference. Even if this were so, this amounts to nothing more than the bare teaching that LANs might be used in alarm systems. However, the way LANs are used and the details of implementing a LAN in the system of the Gilge reference are not disclosed nor suggested. In fact, the Martin reference does not even describe how LANs can be implemented in *any* alarm system -- let alone an alarm system similar to that of the Gilge reference.

Second, the Office Action analogizes the use of LANs in wiring closets as in the Martin reference with the use of alarm systems to provide building security as in the Gilge reference. It is respectfully submitted that wiring the alarm system of Gilge is in no way similar to wiring a LAN using wiring closets. The Gilge reference refers to placing a plurality of cameras within proximity of each other so as to take different pictures of the same location. The feeds from the camera are processed and then evaluated to form a data record. Unlike computers on a LAN. The cameras of Gilge do not, however, require bus access or intercommunication. Accordingly, there is no reason whatsoever to wire the system of the Gilge reference using a star network as provided for in the context of claim 14, as presented.

Based on these reasons, it is respectfully submitted that the Martin reference does not cure the deficiencies of the primary Gilge reference, so that one skilled in the art would not be motivated to combine these references.

For at least the above reasons, claim 14 is allowable. Claims 15 to 26 depend from claim 14, and therefore are allowable for at least the same reasons as claim 14.

In sum, claims 14 to 26 are allowable.

Conclusion

In view of the foregoing, it is respectfully submitted that all of presently pending claims 14 to 26 are allowable. It is therefore respectfully requested that the objections and rejections be withdrawn. All issues raised by the Examiner have been addressed, so that an early and favorable action on the merits is respectfully requested.

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Respectfully submitted,

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